



CH2M HILL
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Sacramento, CA 95833
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August 29, 2011

DOCKET

11-AFC-2

DATE AUG 29 2011

RECD. SEP 06 2011

Mike Monasmith
Compliance Project Manager
Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Air Quality Letters to Docket
Hidden Hills SEGS Project (11-AFC-02)

Dear Mr. Monasmith:

Please find attached the following correspondence re Air Quality that needs to be submitted to Dockets:

- Transmittal Letter for Application for Determination of Compliance and Authority to Construct, submitted to Great Basin Unified APCD on August 3, 2011
- Email correspondence between Richard Beckstead, Permitting Manager, Department of Air Quality and Environmental Management, Clary County, Nevada and Nancy Matthews, Sierra Research regarding air quality cumulative impact analysis.

Thank you for adding these documents to the record.

Sincerely,
CH2M HILL

A handwritten signature in blue ink, appearing to read "John L. Carrier".

John L. Carrier, J.D.
Program Manager

Encl.



1801 J Street
Sacramento CA 95811
Tel: (916) 444-6666
Fax: (916) 444-8373

Ann Arbor MI
Tel: (734) 761-6666
Fax: (734) 761-6755

August 3, 2011

Mr. Duane Ono
Deputy Air Pollution Control Officer
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, CA 93514-3537

Subject: BrightSource Energy Hidden Hills Solar Electric Generating Station
Application for Determination of Compliance and Authority to Construct

Dear Mr. Ono:

On behalf of BrightSource Energy, we are pleased to provide this Application for Determination of Compliance and Authority to Construct for the proposed Hidden Hills Solar Electric Generating Station (HHSEGS) to be located in southern Inyo County. Please find attached a copy of the Air Quality section and Appendix 5.1 from the Application for Certification (AFC) to the California Energy Commission (CEC) for the HHSEGS project. These AFC sections, together with the enclosed Great Basin Unified APCD (District) permit application forms and air quality modeling data on compact disc, are provided for your review. The AFC will be filed with the CEC within the next few days. We are filing this permit application with the District in advance of the AFC filing to provide additional time for the District to make a data adequacy determination in accordance with the CEC AFC process. A copy of the complete AFC will be provided to the District as soon as it is available.

HHSEGS is a solar thermal project consisting of two solar plants. Each solar plant will use heliostats—elevated mirrors guided by a tracking system mounted on a pylon—to focus the sun's rays on a solar receiver steam generator (SRSG) atop a tower near the center of each solar field. In each plant, a steam turbine will receive steam from the SRSG (or solar boiler) to generate electricity. The solar field and power generation equipment will start each morning after sunrise and will shut down in the evening (unless augmented by the auxiliary boilers) when insolation drops below the level required to keep the turbine online. To save water in the site's desert environment, each plant will use dry cooling to cool and condense process water.

Each of the two solar plants includes three natural gas-fired auxiliary boilers that will be used for augmenting the solar operation when solar energy diminishes or during transient cloudy conditions. Each solar plant also includes a natural gas-fired start-up boiler that will be used during the morning start-up cycle to assist the plant in coming up to operating temperature more quickly, for a total of eight boilers subject to District permit requirements. Finally, one emergency diesel generator and one diesel fire pump engine

will be installed at each solar plant and in the project common area, for a total of three emergency generators and three fire pump engines. Daily and annual fuel use limitations are being proposed for the fuel-burning equipment to ensure that emissions remain below certain regulatory thresholds.

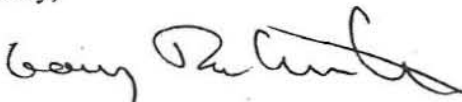
The following equipment will also be part of the project but is exempt from the requirement to obtain a permit:

Equipment Description	Exemption
two 12.2 MMBtu/hr natural gas-fired boilers	District Rule 201.F, exempting "Steam generators ...that have a maximum heat input rate of less than 15 million British Thermal Units (BTU) per hour (gross), and are fired exclusively with natural gas..."
two wet surface air coolers	District Rule 201.D.4, exempting "[w]ater cooling towers ...not used for evaporative cooling of process water..."
two oil-water separators	District Rule 201.H.4, exempting "containers, reservoirs or tanks used exclusively for: ... unheated storage of organic materials with an initial boiling point of 300 F or greater."
two 8,000-gallon diesel fuel storage tanks	District Rule 201.H.4, exempting "containers, reservoirs or tanks used exclusively for: ... unheated storage of organic materials with an initial boiling point of 300 F or greater."

We have included a check for \$100 to cover the filing fee for application. We understand that the District will be billing BSE for the Authority to Construct Initial Permit Fee around the time the Authority to Construct is issued.

Thank you for your time and consideration in this matter. If you have any questions regarding this application, please contact Nancy Matthews or me at (916) 444-6666.

Sincerely,



Gary Rubenstein

Enclosures

cc: John Carrier, CH2M Hill
Clay Jensen, BSE
Jeff Harris, Ellison Schneider & Harris
Susan Strachan



BrightSource

July 29, 2011

Mr. Duane Ono
Deputy Air Pollution Control Officer
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, CA 93514-3537

Subject: Compliance Statement for the BrightSource Energy Hidden Hills Solar Electric Generating Station

Dear Mr. Ono:

In accordance with Rule 209-A, Section A.1, "Standards for Authorities to Construct: General," BrightSource Energy (BSE) is pleased to provide this compliance statement regarding its proposed Hidden Hills Solar Electric Generating Station project.

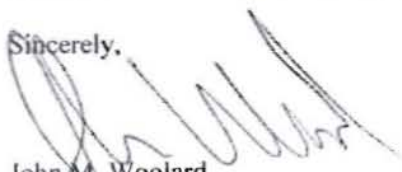
All stationary sources in California that are owned or operated by the applicant are in compliance, or are on approved schedule for compliance, with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 et. seq.) and all applicable emission limitations and standards that are part of the State Implementation Plan approved by the U.S. Environmental Protection Agency. These sources include one or more of the following facilities:

- Ivanpah Solar Electric Generating Station

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Please contact me if you have any questions regarding this certification.

Sincerely,



John M. Woolard
Chief Executive Officer
BrightSource Energy, Inc.

cc: Clay Jensen, BSE
Gary Rubenstein, Sierra Research
Susan Strachan, Strachan Consulting
Jeffery Harris, Ellison Schneider & Harris

Nancy L. Matthews

From: Richard Beckstead <Beckstead@ClarkCountyNV.gov>
Sent: Friday, August 26, 2011 11:39 AM
To: Nancy L. Matthews; Lewis Wallenmeyer
Cc: Tina Gingras; Dennis Ransel; Harish Agarwal
Subject: RE: solar thermal project for southern Inyo County, CA

Nancy,

I am the Permitting Manager for the Department of Air Quality and Environmental Management. Lewis has requested that I research this and provide you with what information we have available. I am providing this email response since you have stated this would be adequate.

We have five permitted sources in, or near, that hydrographic area, but, none of these are within the 6 miles perimeter of the site you have identified. In fact, it appears the closest permitted source is over 20 miles away. Our search of our records did not indicate any proposed authority to construct projects within the area for which we have received an application.

If there is anything other information you require, please let me know.

Richard D. Beckstead
Permitting Manager - DAQEM
(702) 455-1669
beckstead@ClarkCountyNV.gov

From: Nancy L. Matthews [mailto:NMatthews@sierraresearch.com]
Sent: Thursday, August 25, 2011 3:53 PM
To: Lewis Wallenmeyer
Cc: Tina Gingras; Dennis Ransel; Richard Beckstead; Nancy L. Matthews
Subject: RE: solar thermal project for southern Inyo County, CA

Hi again—

I believe this request may have fallen through the cracks. I apologize for not following up sooner, but we have now filed our application with the California Energy Commission and the Great Basin Unified APCD and we expect that we will receive a request for the cumulative impacts analysis in the next few weeks.

If you have determined that there are no facilities within 6 miles of the project site that meet the criteria outlined in the letter, an email response to that effect would be adequate for our response to the agencies.

If you have any questions regarding this request, please do not hesitate to email me. I will be out of the office for the next 3 weeks, but will be available by email.

Thanks very much--

Nancy Matthews
Sierra Research
1801 J Street

Sacramento, CA 95811

nmatthews@sierraresearch.com

916-273-5124 (direct)

916-444-6666 (main)

916-444-8373 (fax)

From: Lewis Wallenmeyer [mailto:Wallenmeyer@ClarkCountyNV.gov]

Sent: Thursday, June 02, 2011 11:25 AM

To: Nancy L. Matthews

Cc: Jan Sudomier; Tina Gingras; Dennis Ransel; Richard Beckstead

Subject: RE: solar thermal project for southern Inyo County, CA

Thank you for your letter. We will conduct a review and prepare a letter of response to you.

Lewis

Lewis Wallenmeyer

Director

Department of Air Quality and Environmental Management

Clark County

500 S. Grand Central Parkway

P.O. Box 555210

Las Vegas, NV 89155-5210

(702) 455-1600

visit us at: www.clarkcountynv.gov

From: Nancy L. Matthews [mailto:NMatthews@sierraresearch.com]

Sent: Thursday, June 02, 2011 10:47 AM

To: Lewis Wallenmeyer

Cc: Nancy L. Matthews; Jan Sudomier

Subject: solar thermal project for southern Inyo County, CA

Dear Mr. Wallenmeyer—

As Jan Sudomier of the Great Basin Unified APCD indicated last week, a solar project is proposed for development in the Charleston View / Calvada Springs area in the south east corner of Inyo County (near Pahrump). Attached is a letter requesting information regarding other development in the project area.

Thank you very much for your assistance. If you have any questions regarding the information we are requesting, please do not hesitate to call or email me.

Nancy Matthews

916-273-5124